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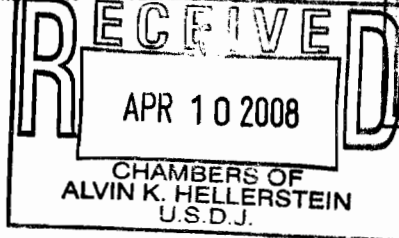
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PLEASE REPLY TO WEST ORANGE

April 10, 2008

Via Facsimile

Judge Alvin K. Hellerstein, U.S.D.J.  
United States Courthouse  
500 Pearl Street, Room 1050  
New York, NY 10007

Re: Santiago Garcia v. SOS Security Incorporated

Dear Judge Hellerstein:

07 CIV. 8277 (AKH)

I represent the Defendant, SOS Security Incorporated ("SOS") in this matter. At an Initial Conference on March 14, 2008, which another associate of this firm attended, Your Honor directed that we file a motion to dismiss the Complaint by Monday, April 14, 2008. By this letter, we respectfully request an extension of the due date for 4 days, until Friday, April 18<sup>th</sup>.

We request the extension because I have had several unexpected, unscheduled matters that had to be tended to, and, therefore, I have been unable to coordinate adequate time to meet with some internal witnesses who will provide necessary information for this motion. Yesterday, I was able to meet with two witnesses and I am preparing to have a telephone conference with the third today if he is available. After speaking with this third witness, I believe we will have adequate information to make the motion.

We have not previously requested an adjournment of this deadline. As stated above, we do not need a significant delay, and we will be able to file the motion within several days of the original due date. However, I have a Court-ordered deposition and Court Conference scheduled

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tomorrow and Monday morning respectively, and, therefore, I am constrained to seek the additional few days to complete the papers.

I have spoken with Mr. Garcia, who is pro se, and he has not given his consent to this request. He informed me that he wants to move this case quickly and, therefore, he does not want us to take any extra time. Although Mr. Garcia and I began a dialogue during that call about potential avenues for resolution, he still did not agree to our request. I recognize that Mr. Garcia's status as a pro se litigant places him at a disadvantage when dealing with a lawyer adversary, and that his lack of familiarity with the litigation process may make him wary of the sort of routine request I made. I try not to seek unnecessary extensions of time, and will not do so in this case. In addition, neither my client nor I want to protract this case in any way, and we will commit to work with Mr. Garcia and this Court to streamline the schedule as much as we can. However, I submit that the current request will have no impact on how long this matter will take to complete and will not prejudice Mr. Garcia's interests in any way. The few extra days I seek will simply allow us to produce concise papers within the constraints of a temporarily harsh schedule. The Court should note that there are no substantial additional deadlines approaching. I submit that our request would typically be agreed to as a matter of professional courtesy by a lawyer adversary, and I request that Your Honor favorably consider this request in the same vein.

Therefore, I respectfully request that Defendant be permitted to file its motion papers by Friday, April 18<sup>th</sup> rather than Monday, April 14<sup>th</sup>. I appreciate Your Honor's consideration of this request.

Very truly yours,

  
Bruce D. Ettman

c: Mr. Santiago Garcia, Plaintiff pro se  
Ms. Glynis Pritchard  
Keyana Laws, Esq.